



DEPARTMENT OF THE NAVY  
BUREAU OF MEDICINE AND SURGERY  
2300 E STREET NW  
WASHINGTON DC 20372-5300

IN REPLY REFER TO  
BUMEDINST 4860.5  
BUMED-13  
8 May 97

BUMED INSTRUCTION 4860.5

From: Chief, Bureau of Medicine and Surgery

Subj: COMMERCIAL ACTIVITIES (CA) PROGRAM

Ref: (a) Office of Management and Budget (OMB) Circular No. A-76 Revised Supplemental Handbook, Performance of Commercial Activities of March 1996  
(b) DoD Instruction 4000.19 (NOTAL)  
(c) OPNAVINST 4860.7B  
(d) OMB Circular No. A-76 Cost Comparison System (COMPARE) version 2.0 (NOTAL)  
(e) BUMEDINST 5310.9

Encl: (1) CA Cost Comparison Major Milestones  
(2) Commercial Activities Training Coordination

1. Purpose. To define management responsibilities, procedures, policy and guidance for implementation of CA initiatives within the Bureau of Medicine and Surgery (BUMED) claimancy.

2. Cancellation. NAVMEDCOMINST 4860.1.

3. Scope. Applies to all BUMED activities in the 50 United States and its territories, the District of Columbia, and the Commonwealth of Puerto Rico. Implementation of these procedures are subject to the overall mission of BUMED and the Total Health Care Support Readiness Requirement (THCSRR) objective of ensuring that sufficient, trained personnel are available upon mobilization to staff the defense force support structure.

4. Background. Reference (a) states, the Government's policy is to rely on private enterprise for supplying the products and services that it needs, provided these services are available at costs below the Government's estimated in-house cost of operation and are not inherently governmental in nature. References (a) through (c) provide policy and procedural guidance to determine whether recurring commercial activities should be operated under contract with commercial sources, in-house using Government facilities and personnel, or through interservice support agreements (ISSAs). Although frequently referred to as the "outsourcing program" or "privatization," CA, outsourcing, and privatization are not one and the same. The CA Program identified herein, provides a means for the Government to compete against the private sector. "Outsourcing" is more commonly associated with shifting functions traditionally done in-house to the private sector. "Privatization" is when Government actually gets out of the business of performing the function and transfers the facilities and the function to the private sector.

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5. Guidance. CA work must be timely, accurate, complete, fully documented, and consistent with Department of the Navy (DON) policy and procedures in references (a) and (c). Focused attention by all echelons of command is required to ensure completion of CA cost study milestones, enclosure (1). Commanders and commanding officers must ensure adequate and trained resources are available to execute the CA Program; establish positive attitudes and realistic goals for the successful completion of cost comparison analyses; and provide continuing management attention in the execution of announced studies at activities under their command.

6. CA Program Process. The following are general provisions for implementing the CA program:

a. Inventories. Activities will maintain a baseline CA inventory and update inventories annually to document the distribution of military and civilian manpower authorizations performing commercial activities, contract workload, and cost data. Inventories shall follow procedures in appendix 2 of reference (a), and supplemental guidance as provided by BUMED.

b. Cost Comparison. The process whereby the estimated cost of in-house Government performance of a CA is formally compared following the principles and procedures in references (a) and (c) to the cost of performance of commercial or ISSA sources.

(1) Activity commanders may choose a method of study depending on the number of civilian full time equivalents (FTEs) involved in the function under study. The type of study, direct or simplified are options to completing a full cost comparison. The following table outlines the cost comparison alternatives:

<u>Types of CA Studies</u>	<u>10 or less FTEs</u>	<u>11 - 45 FTEs</u>	<u>45-65 FTEs</u>	<u>66 or more FTEs</u>
Direct	X			
Simplified		X	X	
Full Cost Comparison				X
<u>Approval Authority to Perform</u>				
Commanding Officer	X			
BUMED		X		
Congress			X	X

(Table 1, data obtained from reference (a)).

The definitions and advantages or disadvantages to each method of study is found in reference (a).

(2) Activities will implement the requirements of a cost comparison following references (a) and (c) to include the following as applicable: (1) development of a Performance Work Statement (PWS) and Quality Assurance Surveillance Plan (QASP); (2) performance of a management study to determine the Government's Most Efficient Organization (MEO); (3) development of an in-house Government cost estimate; (4) issuance of the Request for Proposal (RFP) or Invitation for Bid (IFB); (5) solicitation of the in-house bid against a proposed contract or ISSA price; and (6) initiation of the Administrative Appeals Process.

(3) Once the scope of the CA function under study has been fully defined, the analyst must evaluate the function and determine whether or not a mixed work center exists. A mixed work center is a combination of civilian, military, or contractor staff completing the current function. If military are involved, liaison with your manpower management office to determine if THCSRR billets are involved. Military and civilian FTEs that must be retained to fulfill inherently governmental functions and THCSRR are excluded from the scope of the CA study. Civilian FTEs and military non-THCSRR need to be costed out in the study. Military non-THCSRR must be converted over to civilian equivalents for costing purposes.

(4) Data obtained for the cost comparison must be quantifiable and verifiable. The data source to obtain baseline total costs and FTEs for areas under study should be from the Redistributed Uniform Management Report (RUMR). The cost accounting structure (function/subfunction categories and cost account codes) generally supports the functional areas identified in the CA program. In some cases, the activity's reported FTEs in the CA inventory and RUMR may not match. If other than RUMR data is used for baseline total costs or FTEs the activity must complete a source list and justification for using an alternative data source. Both items are to be submitted with the completed cost comparison package for the independent review.

(5) Activities will use the OMB Circular A-76, Cost Comparison System (COMPARE), reference (d), to generate the activities' cost comparison study. Activities can obtain the system software and manuals upon completion of the Chief of Naval Education and Training (CNET) Cost Comparison Course, per enclosure (2). Additional copies of the software can be obtained through the Healthcare Support Office (HLTHCARE SUPPO) Requirements Determination (REDE) teams.

(6) Exceptions for not completing cost comparisons are in reference (a); all other commercial activities shall have cost comparisons.

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(a) The tendency may be towards recommending retention of CA functions (i.e., in-house performance) as being critical to the accomplishment of the activity's mission. However, exemptions from contracting functions are primarily limited to the inherent governmental nature of the function, which may include: national defense considerations, best interests of patient care, core capability to ensure the Government has the necessary capabilities to fulfill mission responsibilities or meet emergency requirements, and research and development. Other factors which may influence the retention of CA functions in-house are: nonavailability of qualified commercial sources, functions with 10 or fewer civilian FTEs where contractor performance is unsatisfactory or that fair and reasonable prices cannot be otherwise obtained, in-house performance which meets or exceeds generally recognized industry performance and cost standards, in-house cost comparison is lower, and temporary authorization for in-house performance.

(b) CA functions not meeting the above exemption criteria must be recommended for cost comparison. Inherently governmental activities within the CA Program are not subject to OMB Circular A-76 or reference (a).

c. Contract Performance of Commercial Activities. As a matter of policy, the Government shall acquire nonrecurring CAs through contracts with the private sector. The acquisition of a recurring CA by contract may be warranted under the following conditions:

(1) Contracted Activities. A CA obtained through a competitively awarded contract will continue to be obtained by contract as long as the quality of service is acceptable and competitive prices are fair and reasonable. If the Government believes the quality is unacceptable or prices appear unreasonable, a cost comparison shall be conducted to justify conversion to in-house or ISSA performance.

(2) New Requirements. A new requirement will be obtained by a competitively awarded contract. If there is reason to believe contract service quality or prices may be unreasonable, a cost comparison shall be conducted to justify conversion to in-house or ISSA performance.

(3) Severable Expansions. Severable expansions of existing in-house, contracted, or ISSA performed activities are obtained by a competitively awarded contract. If the expansion is not severable, a review of the entire activity, including the proposed expansion, is conducted for potential contract performance. If there is reason to believe contract service equality or prices may be unreasonable, a cost comparison is conducted to justify conversion to in-house or ISSA performance.

(4) ISSA. CAs may be performed by in-house or contract resources or through ISSAs per references (a) and (b).

(5) Activities with 10 or fewer FTEs. CAs involving 10 or fewer FTEs may be performed by in-house, contract, or ISSA performance without cost comparison, if the contracting officer determines that offerors will provide required levels of service quality at fair and reasonable prices.

(6) Activities of 11 to 65 FTEs. CAs involving 11 to 65 FTEs may be converted to contract or ISSA without cost comparison if fair and reasonable prices can be obtained through competitive award and all directly affected Federal employees serving on permanent appointments are reassigned to other comparable Federal positions for which they are qualified. Functions with greater than 65 FTEs will require a full cost comparison.

(7) Activities Performed by the Military. CAs performed by the military may be authorized for direct conversion to contract performance without cost comparison per references (a) and (c).

d. Cost Comparison Waivers. The Chief of Naval Operations (CNO) has the authority to grant cost comparison waivers and direct conversions to or from in-house, contract, or ISSA performance. Cost comparison waivers will be prepared and meet the waiver requirements in reference (a). Forward requests to CNO (N47) via the chain of command.

e. Appeals of Tentative Waiver and Cost Comparison Decisions. Following a tentative waiver or CA cost comparison decision, the OMB Circular A-76 Administrative Appeals process may be invoked.

(1) The appeals process does not authorize an appeal outside the DON or judicial review, nor does it authorize sequential appeals. The appeals process provides reasonable assurance that decisions to waive the cost comparison requirements and CA decisions are properly reviewed and references (a) and (c) are adhered to.

(2) To be eligible for review under the Administrative Appeals process, the appeal must follow the guidelines and submission time frame in reference (a). Applicants shall forward the appeal to CNO (N47) via the chain of command.

## 7. Responsibilities

a. MED-13 is the CA Program manager for the claimancy. Responsibilities include, but are not limited to:

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(1) Directs and coordinates the BUMED CA Program with other cost containment programs.

(2) Serves as the execution authority and point of contact for BUMED field commands, higher authority, and other cognizant Navy commands.

(3) Coordinates with BUMED resource, functional, and program managers as necessary to ensure issues related to the CA Program are adequately staffed and reviewed.

(4) Develops program guidance, advisories, and direction for field commands which ensures adequate command attention is applied to meet higher authority tasking and requirements; all announced CA studies and resultant decisions are implemented expeditiously; all authorized CA positions are properly identified and used in the program area; common problems are identified and corrected; and all changes to existing Navy CA policies and procedures are implemented. MED-13 will issue guidance to echelon 3 commands with procedures for conducting and submitting CA inventories and studies.

(5) Appoints reviewing officials for appeals on cost study determinations and reviews all appeals determinations made by echelon 3 commanders and commanding officers.

b. Echelon 3 Commands. Echelon 3 command responsibilities include, but are not limited to:

(1) Reviews and approves CA work products submitted by their subordinate commands, including PWSs and QASPs, to ensure thorough development. This requirement includes certifying the accuracy of data contained in annual CA inventories and specific cost comparison requirements in references (a) and (c).

(2) Reviews and oversees completion of BUMED tasking to subordinate echelon commands within area of responsibility.

(3) Ensures BUMED plan of action and milestones (POA&Ms) for field commands conducting CA studies are met, or appropriate justifications for POA&M changes are provided to MED-13 via the HLTHCARE SUPPO REDE Team for approval.

(4) Ensures execution of CNO decisions to implement the Navy's MEO or conversion to contract operation. If MEO implementation is authorized, echelon 3 commands shall ensure required organizational, functional, and resource changes are initiated. If contract award is authorized, echelon 3 commands will ensure compliance with the reporting requirements in reference (c).

(5) Ensures resource changes are reflected in future budget requirements and efficiency review reports.

c. Echelon 3 and below Commands. All commands will:

(1) Develop and submit via chain of command work products which include inventories, development of POA&M, status reports, cost studies, appeals, and other related documents, following references (a) and (c), and supplemental BUMED guidance as provided.

(2) Perform CA studies following reference (a), with the authority to perform CA studies for functions with less than 45 FTEs. Activities should submit a letter of intent to BUMED before initiating CA studies. CA functions with greater than 45 FTEs must be announced and approved by Congress before the study.

(3) For those commands which have announced or are conducting CA initiatives:

(a) Upon receipt of a formal cost study announcement message from CNO, BUMED, or when conducting a direct, simplified, or full cost comparison, notify affected employees, unions, and all other parties interested in or impacted by the study, per reference (a).

(b) Establish and train a core team to conduct and oversee the cost comparison study effort. Assign a team leader or project manager to direct the execution of the study. Ensure various subject matter experts are members or augment the study, examples include HLTHCARE SUPPO REDE team, internal CA Program coordinator, manpower, human resources office, fiscal, supply, quality assurance, legal, and command evaluation. Commands are to implement cost comparisons following part II of reference (a).

(c) Initiate formal cost comparisons upon announcement and complete the studies within 18 months for a single CA or 36 months for multiple CAs.

(d) Maintain complete and accurate historical records of workload, manpower, financial, and other information necessary to complete announced cost comparisons and to respond to independent audits or reviews and potential appeals.

(e) Meet established POA&Ms, or submit appropriate justification for changes to MED-13 via the chain of command.

(f) Upon completion of the study, commanding officers will certify and sign their MEO and cost comparison form (CCF). Submit CCF, independent audit results, and recommended course

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of action to BUMED for approval. Activities will submit their MEO to higher authority for approval only if resources are unavailable to support any increase over present authorizations. For studies affecting more than 65 FTEs submit cost study package and recommendation to CNO (N47) via BUMED for approval.

(g) Process appeals concerning tentative waiver and cost comparison decisions per references (a) and (c). Forward appeals, reviewing official's letter of appointment, and appeal decision to MED-13.

(h) Implement the Navy's MEO or convert to contract or ISSA operation, as directed by the CNO or BUMED decision summary, within the time frame directed. Should in-house MEO execution be applicable, perform a post-MEO review 1 year after implementation of in-house operation to ensure operations are executed as required by the PWS and within the MEO staffing plan. If the function is converted to contract operation, comply with reporting requirements in reference (c).

(i) Request for waivers or cancellation of announced cost comparisons should follow reference (a) and forward to CNO (N47) via the chain of command for consideration.

d. HLTHCARE SUPPO REDE Teams. REDE teams responsibilities include but are not limited to:

(1) Training oversight and quota control within their area of responsibility per reference (e) and enclosure (2).

(2) Develop and provide guidance, interpretation, liaison and consulting services to field commands.

(3) Establish a central team with experts who can address all aspects of the cost comparison process and provide on-site assistance to claimancy activities. At a minimum, the central team should be able to provide assistance on the following:

(a) Develop PWSs and QASPs.

(b) Develop and perform management studies and cost comparisons.

(c) Assist and review in the development of methodology for determining manpower requirements for the MEO.

(4) Develop and maintain a CA help desk and telecommunication capability to provide readily available support, guidance, and interpretation of technical issues, training, and on-site support.



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(5) Act as the field liaison with the OPNAV Outsourcing Support Office (OSO) to obtain current data and technical interpretation of regulations and policy; solicit OSO support in areas of PWS development and solicitation guidance.

(6) Develop and publish REDE team assist visit schedule, in conjunction with activity POA&M to ensure claimancy field activity support is available at critical intervals throughout study execution.

(7) Provide support to MED-13 program manager in execution of the CA Program.


#### 8. Program Coordination

a. Staffing. MED-13 has the responsibility for oversight of the CA Program. Naval medical and dental activities in the continental United States, Puerto Rico, and Guam have designated positions for the CA Program coordinators to oversee and assist in the execution of the CA Program at their activities and at field activities under their cognizance. Incumbents of these designated positions must devote a minimum of 50 percent of their effort to the CA Program. Changes to designated CA Program coordinator positions at echelon 3 and 4 commands must have MED-13 approval. Echelon 3 and 4 commands with no designated CA positions shall appoint CA Program coordinators as collateral duty assignments. To ensure adequate support, civilian position descriptions and performance appraisals for CA Program coordinators must reference CA responsibilities.

b. Roster of Coordinators. MED-13 maintains a current list of CA Program coordinators (both designated and collateral duty assignments) for HLTHCARE SUPPOS and BUMED field commands. This roster will be distributed to REDE teams and echelon 3 commands, periodically, for information and updating.

9. Action. All BUMED activities in the 50 United States and its territories, the District of Columbia, and the Commonwealth of Puerto Rico shall comply with references (a) and (c), and this instruction.

10. Form. DD 1556, S/N 0102-LF-001-5562, Request, Authorization, Agreement, Certification of training, and Reimbursement is available per CDROM NAVSUP PUB 600 (NLL).



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## CA COST COMPARISON MAJOR MILESTONES

Activity: \_\_\_\_\_ Cost Study Start Date: \_\_\_\_\_

CA Function: \_\_\_\_\_

ACTION	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Establish Study Team and Develop Plan of Action	XXX																			
Brief/Notify Affected Parties	XXX																			
Conduct Job Analysis (1)		XXX	XXX	XXX	XX															
Develop Most Efficient Organization (MEO)			XXX	XXX	XXX	XXX														
Develop Performance Work Statement (PWS)/Quality Assurance Surveillance Plan (QASP)—coordinate with contracting office					XXXXXXXXXX															
Obtain Command CO's Approval of MEO (2)					X															
Develop/revise/classify position descriptions					XXXXXX															
Develop Management Study report					XXXXX															
Draft PWS/QASP to contracting office					X	XXXXXXXXXX														
Coordinate with Contracting Office on Contracting Actions (3)									XXX	XXX	XXX	XXX	XXX	XXX						
Develop Cost Comparison Form (CCF) in-house costs COMPARE Software						XXXXXX														
Coordinate with REDE Teams for Reviews of PWS, MEO, and CCF							X	XXX												
Complete CCF/Announce Tentative Results													XXX							
Receive/Review Appeals													XXXXX							
Preaward Survey (if applicable)													XXXXXX							
Submit Decision Summary Message																		XXX		
Announce CNO Decision Summary																		X	XX	
Conduct Reduction in Force (RIF) if applicable																		X	XXX	
Implement MEO/Award Contract																			X	XXX

(1) Job analysis is the basis for developing the PWS and MEO; it includes organizational, workload, personnel, performance value, equipment, facility, directives, and other analyses. These analyses are dependent upon the maintenance of complete historical records, and the delegation of responsibilities among study team members and other affected parties.

(2) MEO determination may necessitate revisions to program directives and position descriptions, adjustments to budget authorizations and staffing, and the administration of mock reduction in force (RIF) actions. Increases to the activity MEO must be authorized by higher authority before the MEO can be implemented.

(3) Contracting actions include announcing the study in the Commerce Business Daily, obtaining Department of Labor wage rates, preparing and soliciting contract documents, providing information to bidders where appropriate, opening bids, closing bids, conducting preaward surveys, and awarding contracts.

(This is an outline of events that comprise a full cost comparison study. Time periods may be compressed depending on resources applied and study complexity.)

Enclosure (1)

COMMERCIAL ACTIVITIES TRAINING COORDINATION

1. General

a. CNO has designated the Chief of Naval Education and Training (CNET) as the Navy CA training manager and coordinator for all CA training. Currently, the management and coordination of CA training is performed by the Chief of Naval Education and Training Command Management Engineering Team (CNET NAVEDTRAMET).

b. The CA training curriculum is separated into two courses. The PWS and cost comparison courses. Upon completion of the cost comparison course, students will receive OMB Circular A-76 Cost Comparison software and guidance manuals to conduct cost studies. It is strongly recommended that analysts performing CA cost studies obtain both courses before implementing a study.

c. Training quotas are allocated by CNET NAVEDTRAMET to BUMED for each CA course. MED-13 has delegated to the HLTHCARE SUPPO REDE teams (east & west) control of CA training assignments and quotas. Each REDE team will ensure equitable distribution of training quotas among the geographic field commands in their areas of responsibility. Commands are responsible for ensuring quota requests are based on cost effectiveness of location and duty station.

d. Because CA training requirements may exceed the training quotas available to BUMED, activities will use each training quota allocated. BUMED cannot credibly make a case for more training capacity when training quotas are not effectively used by its commands. Cancellations should be held to a minimum with notification given to the REDE teams in a timely manner to support reallocation of the quota. Activity managers should consider substitutions whenever possible.

2. Scheduling

a. MED-13 will periodically request echelon 3 and 4 commands to identify training quotas, training site preferences, course curricula, and other training requirements to provide consolidated training projections to CNET NAVEDTRAMET. Echelon 3 commands are strongly encouraged to identify training needs for functional managers (i.e., heads of departments are being studied). Recommended changes to course curricula, based on courses taken and subsequent experience, are also solicited and should be reported with the submission of training requirements.

b. CNET NAVEDTRAMET will periodically issue a list of scheduled courses. Submit requests for quotas for specific classes to the REDE team. Upon approval of a quota request, forward DD 1556, Request, Authorization, Agreement, Certification

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of Training, and Reimbursement to the appropriate CNET NAVEDTRAMET training program administrator for each trainee at least 45 days before the course convening date. Commands for which quotas have been assigned will submit copies of DD 1556 for each student to their cognizant REDE team. Approval of a training quota request by the REDE team does not guarantee class availability. The CNET NAVEDTRAMET training program administrators confirm training quotas upon receipt of DD 1556s. Substitution of students for approved quotas may be made by the individual command. Commands should notify their cognizant REDE team immediately of cancellations so quotas may be reallocated.

c. Direct liaison with CNET NAVEDTRAMET training program administrators by BUMED field commands is not authorized.

### 3. Supplemental Training

a. BUMED activities are authorized to attend supplemental CA training, but should request the REDE team to identify any unused training quotas. With training resources in short supply, expenditure of such resources should be undertaken only if there is no other feasible alternative. Cost effectiveness also dictates most CA training shall be centrally procured from CNET, the Navy training manager, or its subordinate commands.

b. There are a number of nongovernmental educational organizations which conduct seminars on OMB Circular A-76. These courses are not certified by any Federal agency and do not provide official policy on the attempt to meet their CA Program training needs by using Navy or DoD-sponsored training courses. Nonavailability of Navy or DoD sponsored courses should be determined before using Office of Personnel Management or other Federal agency sponsored training.